

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KGR HOLDINGS, LLC and	)	
KPF HOLDINGS, LLC,	)	
	)	
Plaintiffs,	)	C.A. No. 25-cv-101 MN-EGT
	)	
v.	)	
	)	
JAL EQUITY CORP, KAPPA GRAPHICS,	)	
LLC, and KAPPA PRODUCT	)	
FULFILLMENT SERVICES, LLC,	)	
	)	
Defendants.	)	

**MOTION FOR TELECONFERENCE TO  
RESOLVE DISCOVERY DISPUTE**

Plaintiffs KGR Holdings, LLC and KPF Holdings, LLC, respectfully move this Court to schedule a teleconference to address outstanding disputes regarding the following discovery matters:

- The scope of deposition topics in plaintiffs’ Rule 30(b)(6) notices directed to defendants JAL Equity Corp., Kappa Graphics, LLC and Kappa Product Fulfillment Services, LLC; and
- Defendants’ search for and production of documents responsive to plaintiffs’ Second Request for Production.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (in person and/or by telephone) on the following dates: Todd Schiltz and Mark Billion conferred on September 8, 2025 for approximately 20 minutes on the disputed discovery issues. This conversation occurred after the parties exchanged written correspondence regarding the disputed issues. After September 8, the parties exchanged additional correspondence which further narrowed the issues in dispute.

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Fact discovery is set to close on September 30, 2025, although the parties have agreed to stipulate to the extension of that deadline through October 30, 2025 for the purposes of deposing Eran Salu, the president of defendant JAL Equity Corp and the Rule 30(b)(6) designee for each of the corporate defendants, and any discovery arising from this motion.

The parties are available for a teleconference on the following dates: Counsel is available at the convenience of the Court for argument and respectfully requests that the Court provide two or three dates that the Court is available on or before October 3. This timing ensures prompt resolution and timely supplemental document production to the extent ordered by the Court.

This dispute is the first time that a discovery or protective order dispute has been brought before the Court.

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/s/ Todd C. Schiltz

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Dated: September 11, 2025

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